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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Smartmatic USA Corp., et. al,  
Plaintiff(s),

vs.

Case No. 22-cv-00098-WMW-JFD

Michael J. Lindell, et al.,  
Defendant(s).

**MEET-AND-CONFER STATEMENT**

I, James R. Bedell, representing the Plaintiffs, hereby certify that:

I met and conferred with the opposing party by:

Meeting with: Andrew Parker and Abraham Kaplan

On: September 12, 13, and 14, 2023

Discussing the following motion: Plaintiffs' Motion for Leave to Complete Limited  
Third-Party Discovery After the Fact Discovery Deadline

As a result of the meet-and-confer, the parties:  
(Check the box that applies.)

☒ Do **not** agree on the resolution of any part of the motion.

☐ Agreed on all or part of the motion and request that the Court incorporate the  
following agreement in an order:

Signed this 27th day of September, 2023.

Signature of Party	<u>/s/ James R. Bedell</u>
Mailing Address	127 Public Square, Suite 4900 Cleveland, OH 44114
Telephone Number	(216) 363-4500

Note: All parties filing the motion must date and sign the Meet-and-Confer Statement and provide their mailing address and telephone number. Attach additional sheets of paper as necessary. The Meet-and Confer Statement must be served on each party, together with the documents required under LR 7.1(b)-(c).